

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT B
Agent Flood Summary

ANDREW FLOOD

SPECIAL AGENT, US IMMIGRATION & CUSTOMS ENFORCEMENT

I am a Special Agent (SA) with Immigration and Customs Enforcement (ICEI) and have been so employed since September of 1996. I am currently assigned to "Operation Alliance", a High Intensity Drug Trafficking Area (HIDTA) Task Force and have been a member of this unit since 2007. Prior to my current assignment, I was assigned to the San Diego Violent Crimes Task Force - Gang Group (VCTF) from 1998 until 2007. Prior to my employment with ICE, I was a Patrol Agent with the U.S. Border Patrol and a Corrections Deputy with the San Diego County Sheriff's Department.

I have received training in the field of narcotics enforcement. In addition to basic narcotic enforcement training at law enforcement academies, I have attended numerous drug and gang investigation training administered by other law enforcement agencies and related professional organizations. I have participated in all aspects of narcotic investigations from street-level distributors to large-scale trafficking organizations. I have received training and have gained experience investigating international, national, and regional criminal organizations engaged in conspiracies to manufacture and/or possess with intent to distribute controlled substances, including marijuana, methamphetamine, cocaine, heroin, and other controlled substances and precursor materials. I am also a member of the California Gang Investigators Association (CGIA), and the Latino Gang Investigator Association. I have attended training administered by

the California Narcotics Officer Association. From my training and experience, I have become familiar with the techniques and methods utilized by drug distributors.

I have interviewed and operated informants, executed search warrants, arrested and interviewed subjects, conducted physical surveillances, utilized electronic and video surveillance, seized property and assets, and testified in federal and state trial courts. During these interviews, members of drug trafficking organizations have explained their methods of operation and their schemes to use and launder drug proceeds. I have directed, as a case agent, and/or participated in a number of drug trafficking and organized crime/gang investigations. I have also reviewed numerous records of interviews conducted by other drug investigators. I have worked with and discussed with other ICE, Federal Bureau of Investigation, Drug Enforcement Administration, San Diego Police Department, Oceanside Police Department, San Diego County Sheriff's Department, and the California Bureau of Narcotics Enforcement agents/officers, as well as other state/local and federal agencies, who have related to me the substance of their similar experiences and the results of their own narcotics and gang investigations and interviews. I have become knowledgeable in the methods and modes of narcotics operations and the language used relating to drug trafficking. I am aware of techniques that are often used to attempt to detect and/or hinder law enforcement investigations of drug trafficking organizations including the use of multiple sources of communication devices; the use of coded communication; and use of false

and/or fictitious identities. As a result of my training and experience, and interactions with other drug/gang investigators, I have become knowledgeable with the distribution and trafficking methods employed by drug traffickers to smuggle, import, safeguard, store, transport, and distribute drugs, and to collect and conceal drug-related proceeds. I have become knowledgeable in the sale price of narcotics controlled substances in San Diego as well as other areas of the United States.

During the course of my participation in investigations of drug trafficking and organized crime organizations I have written reports and affidavits, and analyzed records and other relevant documents. Through my employment with ICE, I have gained knowledge in the use of various investigative techniques including the utilization of physical surveillance, undercover agents, confidential informants and cooperating witnesses, controlled purchases of narcotic controlled substances, electronic surveillance, international controlled deliveries, consensual recordings, investigative interviews, trash covers, mail covers, financial investigations, the service and use of Administrative and Grand jury Subpoenas, and the execution of search and arrest warrants.